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IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH

In re:

JUSTIN DEAN BARROW,

Debtor.

CHAPTER 13

Bankruptcy Case No. 23-20773

Judge Joel T. Marker

NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY
and NOTICE OF OPPORTUNITY FOR HEARING

(Objection Deadline: **Friday, June 2, 2023**)

PLEASE TAKE NOTICE that Mountain America Federal Credit Union has filed with the United States Bankruptcy Court for the District of Utah, a Motion for Relief from the Automatic Stay (the “Motion”).

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

The Motion seeks an order of the Court terminating the automatic stay with respect to a 2022 Dodge Challenger, vehicle identification number 2C3CDZFJ8NH179627 and a 2022 Land Rover Range Rover, vehicle identification number SALWR2SE7NA201098, in which the Debtor has an interest.

NO HEARING WILL BE CONDUCTED ON THE MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.

If you do not want the Court to grant the relief requested in the Motion, then you or your attorney must take the following two steps:

(1) on or before **Friday, June 2, 2023** file with the Bankruptcy Court a written Objection explaining your position. Your written objection must be filed electronically, by mail, or by hand-delivery at:

United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, Utah 84101

If you mail your objection to the Bankruptcy Court for filing, it must be deposited in the U.S. Mail in sufficient time for it to be **received** by the Court on or before **Friday, June 2, 2023**. You must also mail a copy to the undersigned counsel at:

Darwin H. Bingham
SCALLEY READING BATES HANSEN & RASMUSSEN, P.C.
15 West South Temple, Suite 600
Salt Lake City, Utah 84101
Attorneys for Mountain America Federal Credit Union

(2) Attend a hearing on Wednesday, June 14, 2023 at 9:00 a.m. before the Honorable Joel T. Marker. The hearing on the Objection, if held, will be conducted by Zoom hearing pursuant to the direction of the Bankruptcy Court. Parties who wish to participate in the hearing should consult the Bankruptcy Court's website at <https://www.utb.uscourts.gov/> for the most up-to-date information regarding Zoom participation at a hearing. At the time of this Notice, parties wishing to participate in hearings before the Honorable Joel T. Marker should join the hearing using the information provided below at least ten (10) minutes before the scheduled date and time for the hearing:

Zoom URL: <https://www.zoomgov.com>

Meeting ID: 161 5478 8875

Passcode/Participant ID: 3834658

There will be no further notice of the hearing, and failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting the requested relief. In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to enter an order approving the Motion without hearing.

DATED this 16th day of May, 2023.

SCALLEY READING BATES
HANSEN & RASMUSSEN, P.C.

/s/ Darwin H. Bingham
Darwin H. Bingham
Attorneys for Mountain America Federal Credit Union

CERTIFICATE OF SERVICE -
BY NOTICE OF ELECTRIC FILING (CM/ECF)

I hereby certify that on the 16th day of May, 2023, I electronically filed the foregoing **NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND NOTICE FOR OPPORTUNITY OF HEARING** with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system.

- Scott S. Bridge – sbridge@keslerrust.com
- Daniel C. Green – dan@racineolson.com; mcl@racinelaw.net
- Lon Jenkins – ecfmail@ch13ut.org; lneeb@ch13ut.org
- Tyler J. Jensen – tylerjensen@lebaronjensen.com; linda@lebaronjensen.com
- Jason B. Richards – jason@jbrlawyers.com; assistant@jbrlawyers.com; richardsjr66365@notify.bestcase.com
- United States Trustee – USTPRegion19.SK.ECF@usdoj.gov
- Aaron M. Waite – aaronmwaite@agutah.gov

CERTIFICATE OF SERVICE -
BY MAIL, OTHER

I hereby certify that on the 16th day of May, 2023, I caused to be served a true and correct copy of the foregoing **NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND NOTICE FOR OPPORTUNITY OF HEARING** as follows:

Mail Service - by regular first class United States mail, postage fully pre-paid, addressed to:

Justin Dean Barrow
2579 W. 2725 N.
Farr West, UT 84404

/s/ Catrina Nay